

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

SEVEN NETWORKS, LLC,	
v.	
GOOGLE LLC,	
Defendant.	
	CIVIL ACTION NO. 2:17-cv-442-JRG LEAD CASE
	PATENT CASE
	JURY TRIAL DEMANDED

**DECLARATION OF LANCE YANG IN SUPPORT OF GOOGLE LLC'S RESPONSE
TO SEVEN'S MOTION TO COMPEL GOOGLE TO PRODUCE SOURCE CODE**

I, Lance Yang, declare as follows:

1. I am an attorney at the law firm of Quinn Emanuel Urquhart & Sullivan, LLP, counsel for Defendant Google LLC in this matter. I have personal knowledge of the facts stated herein and if called to testify could and would competently testify thereto.

2. On November 15, 2017, Google produced source code to Plaintiff SEVEN Networks, LLC.

3. SEVEN did not review the code produced by Google until February 28, 2018.

4. On April 2, 2018, SEVEN sent a letter making a request for additional code.

SEVEN did not make any requests for additional code until this letter.

5. On May 11, 2018, Google sent a letter asking for information to help Google respond to SEVEN's request. SEVEN did not respond to this letter.

6. On June 15, 2018, SEVEN sent a letter with a 10-page table of source code requests. Google diligently investigated and responded to each request on June 25, 2018.

7. On June 26, 2018, the parties met and conferred. During the meet-and-confer, SEVEN indicated that it did not want to discuss the specific code requests that it had made on

June 15 but, rather, was going to move to compel Google to produce “the entirety” of certain codebases regardless of whether Google was able to resolve the outstanding issues with SEVEN’s requests made on June 15.

8. On July 16, 2018, SEVEN sent a letter requesting, for the first time, “the entire device-side code for the Nexus and Pixel products” because it would allegedly be the “more efficient approach.” (Ex. 1).

9. Around 11 pm on July 26, 2018, SEVEN sent an email with specific requests for source code. (Ex. 2.) Google produced the requested source code the next day. (*Id.*)

10. Google had already produced the server code for the Google Play Console on the review computer at the following locations: [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

11. On August 3, 2018, the parties met and conferred. During the meet-and-confer, SEVEN committed to checking with its expert to confirm was still at issue.

12. Regarding the alleged missing files identified by SEVEN in footnote 1 of the Motion, to the extent that Google can understand these requests, Google either has already produced or has offered to produce this code. Google has already offered to produce the application code for “Play Movies & TV, Play Music, [and] Play Books.” Regarding the “code for [REDACTED],” to the extent this code existed at the time Google made its initial collection, Google produced this code within the directories at [REDACTED]

[REDACTED] Regarding [REDACTED] code, Google produced the code for [REDACTED]

[REDACTED] Regarding [REDACTED] code, Google produced the code for [REDACTED]

Regarding "the code relating to providing and/or handling [REDACTED]

[REDACTED]" Google produced this code at [REDACTED]

[REDACTED] While it is unclear what SEVEN means by its vague description of "backend server code for delivering content through Play Movies & TV," Google has produced code relevant to the delivery of video content at [REDACTED]

[REDACTED] Regarding [REDACTED] this will be included in the server code Google has already offered to produce. Finally, it is unclear what SEVEN means by [REDACTED]

[REDACTED] Google has requested further clarification from SEVEN and is investigating this request.

13. Google is not withholding the device-side code called out in SEVEN's infringement contentions. For example, Google has already produced all accused versions of the Android operating system code, each of which is millions of lines of code. Google has also produced additional proprietary device-side code that could potentially be relevant to SEVEN's infringement contentions, including for example, [REDACTED]

14. Attached as Exhibit 1 is a true and correct copy of a letter from Justin Cohen to Charles Verhoeven, dated July 16, 2018. Attached as Exhibit 2 is a true and correct copy of an email chain between counsel for Google and SEVEN, dated July 27, 2018.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed August 6, 2018 in Los Angeles, California.

/s/ Lance Yang
Lance Yang